

MCI WORLD COM

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January 10, 2000

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Ms. Magalie Romas Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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JAN 10 2000

CC Docket No. 99-200

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Ms. Salas:

On January 7, 2000, Mary DeLuca, Hank Hultquist, Steve Addicks, and I of MCI WorldCom met with Chuck Keller, Diane Harmon, Les Selzer, Tejal Metha, Aaron Goldberger, and Barry Payne of the Common Carrier Bureau's Network Services Division. We discussed the need for national, uniform numbering policies including uniform rules for the implementation of thousands-block number pooling. We also stressed the importance of long-term numbering policies to insure sufficient resources to meet consumer demand. We distributed the attached document at the meeting.

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an original and one copy of this memorandum are being filed with your office.

Sincerely,


Karen M. Johnson
Associate Counsel, Regulatory Affairs

cc: Chuck Keller
Diane Harmon
Les Selzer
Tejal Metha
Aaron Goldberger
Barry Payne

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Numbering Priorities: Pooling and Beyond

MCI WorldCom, Inc.
CC Docket No. 99-200
Ex Parte Presentation
January 7, 2000

FCC Has Pivotal Role

- Pooling implementation must stay on track.
- Phased implementation is most effective.
- National roll-out schedule needed.
- Long-term plan for numbering needed now.

Pooling Implementation Must Stay on Track

- FCC Order needed no later than March 2000:
 - Must officially choose pooling administrator;
 - Cost recovery for shared-costs must be addressed;
 - Many states waiting for FCC Order.
- All carriers' LNP databases must be ready to support pooling volumes.
- Equipment waivers shouldn't be allowed.

Phased Implementation Most Effective

- Pools created most quickly with clean NXX-blocks:
 - No porting-back of working numbers to current carrier;
 - Most efficient pooling approach;
 - Reduces service risk (e.g., double assignment problem.)

Phased Implementation Most Effective

- Using contaminated blocks is not cost-effective:
 - availability is short-lived;
 - choice of contamination level is arbitrary;
 - discriminates against new entrants;
 - difficult, almost impossible to enforce (need constant audits);
 - increases service risks.
- Two NPAs/NPAC region/month for first year will work.

National Schedule is Needed

- FCC conducts NPA lottery/NPAC region to prioritize NPA pool creation:
 - states input list of priority NPAs;
 - onetime effort for sequence initial pool creations.
- Delegate to state PUCs subsequent pool creation.
- National implementation schedule needs to cover NPAs where pooling has not begun.
- State and FCC combined activity should not exceed 2 NPAs/NPAC region/month.

Long-Term Plan for Numbering

Number Shortages Should Not Limit Consumer Choice

- Pooling is only first step to ensure availability of numbers.
- Continue to address root cause of problem.
- Establish milestones for the expanded numbering plan.
- Lead international outreach program.

1K Pooling Improves NXX Efficiencies, But Additional Measures Will Be Needed

- Continued entry by new service providers.
- Introduction of new services:
 - universal messaging services (e.g., free fax relay and voice mail)
- Must plan beyond pooling.

Addressing Root Cause is Critical

- Geographic limitations on NPA-NXX use needlessly strand resources.
- Consumers are embracing mobility and non-geographic addressing systems.
- Numbering plan and network must adapt.
- The evolving numbering plan should provide greater capacity and flexibility.
- Commission should direct NANC to investigate severing relationship between NPA-NXX and rate area.

Set the Stage for Expanded NANP

- Current INC group working on NANP expansion for over five years.
- FCC should step in and direct NANC to recommend format for expanded NANP.
- NANP expansion must be coordinated with all member countries

Robust Consumer Choice Requires Both Short and Long Term Action

- National pooling implementation.
- Continue to address root cause of NXX shortage.
- Prepare now for NANP expansion.
- Lead in international coordination effort